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Assistant U.S. Attorney Nomi D. Berenson
United States Attorney's Office
271 Cadman Plaza East
Brooklyn, New York 11201

By email and ECF

Re: USA v Nimboko Miller, 16 CR 34 (AMD)

Dear Ms. Berenson,

I write pursuant to Rule 16 (E)(i) of the Federal Rules of Criminal Procedure and the relevant case law which requires the government upon a defendant's request to provide documents and objects material to preparing the defendant's defense.

In the reverse proffer between counsel and the government on or about May 26, 2016, and last week in court, the government indicated that there were other individuals or entities that were involved in the Wells Fargo Bank mortgage loan to Andrea Murray which is the subject of this indictment who the government suspected of being co-conspirators and/or of having committed illegal acts in connection with the extension of that loan.

Last week in court you indicated that the attorney for H & Z Abstract which was the Company involved in the closing of Ms. Murray's loan, whose name was revealed to me in a recent email, had plead guilty to an unspecified crime. I have reason to believe that this crime is related to the facts of this case.

This week, I attempted to obtain the information about this attorney's case from the EDNY ECF website. There is no indication that he was ever arrested or that there is a pending case against him. This leads me to conclude that he might be a co-operating witness, a co-conspirator in this case, and that his case is sealed.

Considering the information that was revealed to me during Nimboko's Miller's reverse proffer on or about May 26, 2016, I believe the government might also be in possession of additional information regarding co-conspirators in this case that may tend to exculpate Mr. Miller. Please provide me with all relevant documents and material that are within the government's possession , which the government knows to exist, or which through due diligence can be obtained by the government.

Yours truly,

Marion Seltzer